

DEPARTMENT OF WATER AND POWER

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May 18, 1983

Mr. James H. Anthony
Project Director
Intermountain Power Project
931 General Office Building

Meeting Between the Utah Department of Health (DOH)
and the Department Concerning Modification of the
Air Quality Permit for Intermountain Power Project (IPP)

On May 13, 1983, Mr. Ronald L. Nelson of the IPP Project Office and our Mr. Roger T. Pelote met with Mr. Brent C. Bradford, Director, Bureau of Air Quality, DOH, and members of his staff to discuss the technical review that DOH is conducting for modification of the air quality permit for IPP. A record of the meeting is attached for your information.

In accordance with a request made by Mr. Nelson after the meeting, Mr. Pelote will assist in the preparation of a response to DOH's request for additional technical information. He will also further investigate the possibility of eliminating the need for a Best Available Control Technology review through the use of a proposed new permit condition that would ensure that total emissions from each unit will not exceed those that were calculated for the existing permit.

If you have any questions or comments, please contact Mr. Roger T. Pelote on extension 3412.

A. F. Tessen

A. F. TESSEN
Acting Manager
Civil, Structural Engineering
and Services

RTP:ika

Attachment

cc: w/Attachment

Norman E. Nichols (2)
D. M. Pappe
V. L. Pruett
R. L. Nelson
B. Campbell
IPP File
Robert C. Burt
Patrick P. Wong
A. S. Buchanan
E. N. Friesen

J. J. Carnevale
N. F. Bassin
R. E. Gentner
✓ D. W. Fowler
Manager, Civil, Struct.
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A. F. Tessen
M. J. Nosanov
L. A. Kerrigan
T. L. Conkin
R. T. Pelote

Meeting with Utah Department of Health
May 13, 1983

At the request of Mr. David Kopta of the Utah Department of Health (DOH) a meeting was held in Salt Lake City, Utah, on May 13, 1983 to discuss the technical aspects of the limited Best Available Control Technology (BACT) review being performed by DOH staff for modification of the air quality permit for Intermountain Power Project (IPP). Attendance was as follows:

Brent C. Bradford, Director, Bureau of Air Quality, DOH
David Kopta, Staff Engineer, DOH
John Walton, Staff Engineer, DOH
Ronald L. Nelson, IPP Project Office, DWP
Roger T. Pelote, DWP
James Holtkamp, IPA legal counsel

Mr. Nelson presented technical information that had been requested by Mr. Kopta in a telephone conversation with Mr. Pelote. Mr. Nelson provided handouts on boiler size relationships (Attachment 1), Babcock & Wilcox's dual register burner (Attachment 2) and furnace dimensions (Attachment 3). He also discussed the feasibility of the addition of overfire air ports, reduction of air preheat and flue gas recirculation for reducing NOx emissions. Mr. Kopta presented a letter addressed to Mr. Pelote requesting this information (Attachment 4); however, it was agreed that DOH would supersede that letter with a new one addressed to Mr. James H. Anthony requesting the following additional information:

1. Costs/benefits analysis for other methods of NOx reduction for installation both before and after commercial operation of IPP.
 - a. Thermal DeNOx
 - b. Low excess air (5-6 percent)
 - c. Boiler plan heat release rate
2. Overall project costs for comparison to estimated modification costs.
3. Coal qualities and the impact of fuel-bound nitrogen on NOx emissions.
4. Explanation of economic assumptions and methods used by Black & Veatch in the memorandum concerning selective catalytic reduction and 95-percent SO₂ removal that was submitted to Mr. Bradford with our letter of April 14, 1983.

Mr. Kopta indicated that he has concluded that flue gas recirculation is not feasible for IPP and that reduction of air preheat is not applicable to coal-fired plants. Much of his information on NOx control appeared to be from an Environmental

Protection Agency (EPA) document titled "Technology Assessment Report for Industrial Boiler Applications - NOx", EPA-600/7-79-178f. He mentioned that Shell Oil Company is planning to use thermal DeNOx (Exxon process) for their proposed coal-fired Belridge cogeneration plant in Kern County, California.

Mr. Bradford indicated that he could be prepared to issue a Notice of Intent (NOI) on IPP as early as mid-June. He agreed to discuss his findings with IPP project personnel prior to public issuance of the NOI. Processing of the NOI will include a public hearing by DOH if requested by interested persons within 15 days of NOI issuance. Such a request appears likely. DOH will consider public comments and issue a modified permit to IPP. Appeal of the modified permit can be made by project proponents or opponents to the Utah Air Conservation Committee (UACC) within 20 days.

Mr. Bradford stated that IPP will probably not be discussed at the UACC meeting scheduled for May 23, 1983 and provided copies of the tentative agenda (Attachment 5), an agenda transmittal memorandum to the UACC (Attachment 6) and a memorandum to UACC summarizing the IPP submittal of April 14, 1983 (Attachment 7).

The possibility of eliminating BACT analysis from the permit modification process (through the use of new permit conditions that would ensure that total emissions from each unit would not exceed those calculated for the existing permit) was discussed. Mr. Bradford appeared to realize that this could be a viable alternative, and said he would consider this type of proposal from IPP.

Attachments